

REMARKS/ARGUMENTS

Responsive to the Office Action mailed October 3, 2005:

- A. The Office Action rejected claims 1, 2, 6, 10, and 13 under 35 USC 103(a) as being unpatentable over Offutt in view of Krakauer. Applicant respectfully traverses the rejection.

The Examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness.¹ If the Examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of non-obviousness.²

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure.³

Applicant respectfully traverses the § 103 rejection because the office action has not established a *prima facie* case of obviousness.

The references do not teach or suggest all the claim limitations.

As to claim 1, neither reference discloses slots extending through the shelf from the top surface to the bottom surface. See Krakauer Fig. 8 (the bottom of the shelf is designated as reference numeral 3. The slot does not extend through the shelf to the bottom surface of the shelf).

Claims 2 and 6 contain additional elements or limitations beyond allowable claim 1 and are also allowable.

¹MPEP Sec. 2142.

² Id.

³Id. (emphasis supplied)

Claim 10 is also allowable for the reason given above in regard to claim 1. Furthermore, Krakauer does not disclose helical feeder coils resting in the slot with part of each convolution protruding therethrough from the top surface to the bottom surface.

Claim 13 contains additional elements or limitations beyond allowable claim 10 and is also allowable.

B. The Office Action rejected claims 1, 2, 6 9 through 13, 21 and 26 under 35 USC 103(a) as being unpatentable over Offutt in view of Wittern. Applicant respectfully traverses the rejection.

As to claim 1, neither reference discloses slots extending through the shelf from the top surface to the bottom surface. See Wittern Fig. 3 (the bottom of the shelf is designated as reference numeral 21. The slot does not extend through the shelf to the bottom surface of the shelf).

Claims 2, 6, and 9 contain additional elements or limitations beyond allowable claim 1 and are also allowable.

Claim 10 is also allowable for the reason given above in regard to claim 1. Furthermore, Wittern does not disclose helical feeder coils resting in the slot with part of each convolution protruding therethrough from the top surface to the bottom surface.

Claims 11 through 13 contain additional elements or limitations beyond allowable claim 10 and are also allowable.

Claim 24 has been cancelled and its elements and limitations incorporated into claim 21, which is now allowable.

Claim 26 contains additional elements or limitations beyond now allowable claim 21 and is also allowable.

C. The Office Action rejected claims 1 through 3, 10 and 13 under 35 USC 103(a) as being unpatentable over Offutt in view of Sturrock. Applicant respectfully traverses the rejection.

As to claim 1, neither reference discloses slots extending through the shelf from the top surface to the bottom surface. See Sturrock Fig. 2 (the bottom of the shelf is designated as reference numeral 12. The slot does not extend through the shelf to the bottom surface of the shelf).

Claims 2 and 3 contain additional elements or limitations beyond allowable claim 1 and are also allowable.

Claim 10 is also allowable for the reason given above in regard to claim 1. Furthermore, Sturrock does not disclose helical feeder coils resting in the slot with part of each convolution protruding therethrough from the top surface to the bottom surface.

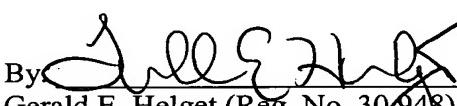
Claim 13 contains additional elements or limitations beyond allowable claim 10 and is also allowable.

For the above reasons, Applicant respectfully requests the allowance of all claims and the issuance of a Notice of Allowance.

Applicant thanks the Examiner for indicating the allowable subject matter.

Respectfully submitted,

Dated: 24 OCT 05

By 
Gerald E. Helget (Reg. No. 30,948)
Nelson R. Capes (Reg. No. 37,106)
BRIGGS AND MORGAN, P.A.
2200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 977-8480